

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

IN RE: )  
 )  
EASTERN LIVESTOCK CO., LLC ) Case No. 10-93904-BHL-11  
 )  
Debtor. )

**JOINDER OF TRUSTEE'S  
OBJECTION TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY AND ABANDONMENT OF PROPERTY  
FILED BY PEOPLES BANK & TRUST COMPANY OF PICKETT COUNTY**

Kathryn L. Pry, Chapter 7 Trustee of the Bankruptcy Estate of Thomas P. Gibson and Patsy M. Gibson, Case No. 10-93867-BHL-7A (the "Gibson Trustee"), by counsel, joins the *Trustee's Objection to Motion for Relief from Automatic Stay and abandonment of property filed by Peoples Bank & Trust Company of Pickett County* (the "Trustee's Objection") filed by James A. Knauer, as trustee (the "Trustee") in the above-captioned case and, for the reasons stated therein, objects to the *Motion for Relief From Automatic Stay and Abandonment of Property Filed by Peoples Bank & Trust Company of Pickett County* (the "Motion"). As the Trustee points out, there may be equity in the subject property that can be realized for the benefit of creditors of the estate. Peoples Bank & Trust Company of Pickett County has made no showing that the estate lacks equity in the subject property and is therefore not entitled to relief from stay, let alone abandonment, at this time.

This joinder incorporates by reference the arguments set forth in the Trustee's Objection and shall be deemed to be a separate pleading from the Trustee's Objection, such that if the Trustee's Objection is withdrawn, this joinder shall remain of record in this chapter 11 case.

WHEREFORE, the Gibson Trustee respectfully requests that the Court enter an order denying the Motion and granting such other relief as is just and proper.

Respectfully submitted,

DALE & EKE, P.C.

By: /s/ Meredith R. Thomas  
Meredith R. Thomas (Atty. No. 28804-49)  
Deborah J. Caruso (Atty. No. 4273-49)

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Attorneys for Kathryn L. Pry, Trustee

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2011, a copy of the foregoing *Objection to Motion for Relief from Automatic Stay and Abandonment of Property Filed by Peoples Bank & Trust Company of Pickett County* was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on March 10, 2011, a copy of the foregoing *Objection to Motion for Relief from Automatic Stay and Abandonment of Property Filed by Peoples Bank & Trust Company of Pickett County* was mailed by first-class U.S. Mail, postage prepaid, and properly addressed to the following:

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Eastern Livestock Co., LLC  
135 W. Market Street  
New Albany, IN 47150

National Cattlemen's Beef Association  
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6031 SW 37th St.  
Topeka, KA 66610

/s/ Meredith R. Thomas  
Meredith R. Thomas

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